



8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 June 2022 Grand Jury

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 FERES JERIES RABADI,
15 Defendant.

CR 2:22-cr-00507 -FWS

I N D I C T M E N T

[26 U.S.C. § 7206(1): Subscribing
to a False Tax Return]

16
17 The Grand Jury charges:

18 COUNT ONE

19 [26 U.S.C. § 7206(1)]

20 On or about August 18, 2016, in Los Angeles County, within the
21 Central District of California, defendant FARES JERIES RABADI
22 willfully made and subscribed to a materially false United States
23 Individual Income Tax Return, Form 1040, for the calendar year 2015,
24 which defendant RABADI verified by written declaration that it was
25 made under the penalties of perjury, and caused that tax return to be
26 filed with the Internal Revenue Service, knowing it to contain false
27 information as to a material matter. Specifically, defendant RABADI
28 falsely claimed on line 22 that his total income for that year was

1 \$90,199, when, in fact, as defendant RABADI then knew, his total
2 income was substantially higher than that amount.

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1 COUNT TWO

2 [26 U.S.C. § 7206(1)]

3 On or about August 29, 2017, in Los Angeles County, within the
4 Central District of California, defendant FARES JERIES RABADI
5 willfully made and subscribed to a materially false United States
6 Individual Income Tax Return, Form 1040, for the calendar year 2016,
7 which defendant RABADI verified by written declaration that it was
8 made under the penalties of perjury, and caused that tax return to be
9 filed with the Internal Revenue Service, knowing it to contain false
10 information as to a material matter. Specifically, defendant RABADI
11 falsely claimed on line 22 that his total income for that year was
12 \$78,977, when, in fact, as defendant RABADI then knew, his total
13 income was substantially higher than that amount.

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1 COUNT THREE

2 [26 U.S.C. § 7206(1)]

3 On or about October 11, 2018, in Los Angeles County, within the
4 Central District of California, defendant FARES JERIES RABADI
5 willfully made and subscribed to a materially false United States
6 Individual Income Tax Return, Form 1040, for the calendar year 2017,
7 which defendant RABADI verified by written declaration that it was
8 made under the penalties of perjury, and caused that tax return to be
9 filed with the Internal Revenue Service, knowing it to contain false
10 information as to a material matter. Specifically, defendant RABADI
11 falsely claimed on line 22 that his total income for that year was
12 \$38,810, when, in fact, as defendant RABADI then knew, his total
13 income was substantially higher than that amount.

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1 COUNT FOUR

2 [26 U.S.C. § 7206(1)]

3 On or about October 29, 2019, in Los Angeles County, within the
4 Central District of California, defendant FARES JERIES RABADI
5 willfully made and subscribed to a materially false United States
6 Individual Income Tax Return, Form 1040, for the calendar year 2018,
7 which defendant RABADI verified by written declaration that it was
8 made under the penalties of perjury, and caused that tax return to be
9 filed with the Internal Revenue Service, knowing it to contain false
10 information as to a material matter. Specifically, defendant RABADI
11 falsely claimed on line 6 that his total income for that year was

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1 \$42,999, when, in fact, as defendant RABADI then knew, his total
2 income was substantially higher than that amount.

3 A TRUE BILL
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5 /S/
6 Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney



9
10 SCOTT M. GARRINGER
11 Assistant United States Attorney
Chief, Criminal Division

12 SHAWN J. NELSON
13 Assistant United States Attorney
14 Chief, International Narcotics,
Money Laundering, and
Racketeering Section

15 BRITTNEY M. HARRIS
16 Assistant United States Attorney
17 Deputy Chief, International
Narcotics, Money Laundering, and
Racketeering Section

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